

ALAN L. FRANK •*+
KYLE M. KULZER*+
SAMANTHA A. MILLROOD*+
EVAN L. FRANK *+Δ
JORDAN E. FRANK *+
JACLYN H. FRANK *+Δ
JEFFREY J. GOLDIN *+
DANIEL A. ROSS *
PATRICK W. BROWN *■

PARALEGALS
DEBRA E. MCGUCKIN
DEE A. WILK
DAWN M. WELSH

• Certified by the NJ Supreme Court
as a Civil Trial Attorney
* MEMBER PA BAR
+ MEMBER NJ BAR
° MEMBER NY BAR
Δ MEMBER FL BAR
■ MEMBER DC BAR
Δ REGISTERED PATENT ATTORNEY

**ALAN L. FRANK
LAW ASSOCIATES, P.C.**
Attorneys at Law

135 OLD YORK ROAD
JENKINTOWN, PA 19046
(215) 935-1000
FAX NO. (215) 935-1110

NEW JERSEY OFFICE

1103 LAUREL OAK ROAD
SUITE 140
VOORHEES, NJ 08043

E-MAIL ADDRESS:
efrank@alflaw.net

August 24, 2021

VIA EMAIL: Chambers_of_Judge_R_Barclay_Surrick@paed.uscourts.gov

R. Barclay Surrick, Senior Judge
8614 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

***Re: AC2T, Inc. v. Colin Purrington
2:19-cv-05946-RBS***

Dear Judge Surrick:

I am counsel for the Plaintiff in this case. I am writing to ask the Court to direct the Defendant to comply with two discovery requests.

1. Document requests (Exhibit A), which are 6 months overdue.
2. Defendant's deposition (Exhibit B), which the Plaintiff has been trying to schedule for 4 months.

No objection has been raised. The defense just refuses to respond.

Defense counsel has stopped responding to my inquiries about the status of these requests. I have attempted to work out these issues with counsel. However, it is impossible to do so when counsel will not even discuss them.

For the document requests, the Defendant has not responded, has not served objections, and has not produced the documents themselves. For the deposition, the defense simply refuses to schedule the deposition since the Plaintiff first sought it in April.

R. Barclay Surrick, Senior Judge
August 19, 2021
Page Two

I request that the Court either order the Defendant to comply or schedule a conference with counsel to discuss these issues. A proposed order is attached. Thank you for your attention to this matter.

Respectfully,

/s/ Evan L. Frank

:elf

Enclosure

cc: Trevor C. Serine, Esq. (e-mail: tcs@serinelaw.com)